

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE  
AT KNOXVILLE

<b>AMANDA MICHEL, as parent and natural</b>	)	
<b>guardian of D.M., a minor, and</b>	)	
<b>AMANDA MICHEL, individually,</b>	)	
	)	
<b>Plaintiffs,</b>	)	
	)	
<b>v.</b>	)	<b>Civ. No.: 3:20-cv-00246-TAV-HBG</b>
	)	
<b>UNION COUNTY BOARD OF EDUCATION;</b>	)	
<b>UNION COUNTY PUBLIC SCHOOLS;</b>	)	
<b>UNION COUNTY, TENNESSEE; JAMES E.</b>	)	
<b>CARTER, individually and officially as</b>	)	
<b>Director of Union County Board of Education;</b>	)	
<b>LARRY KERR, individually and officially as</b>	)	
<b>a teacher and head football coach of Union</b>	)	
<b>County High School; DEREK MARLOW,</b>	)	
<b>individually and officially as a teacher and</b>	)	
<b>football coach of Union County High School;</b>	)	
<b>and SHANE BROWN, individually and</b>	)	
<b>officially as a teacher and athletic director of</b>	)	
<b>Union County High School,</b>	)	
	)	
<b>Defendants.</b>	)	

**JOINT MOTION FOR EXTENSION OF TIME FOR PLAINTIFFS TO FILE RESPONSIVE  
PLEADINGS TO DEFENDANTS UNION COUNTY BOARD OF EDUCATION, JAMES E.  
CARTER, LARRY KERR, DEREK MARLOW, AND SHANE BROWN'S MOTION TO  
DISMISS PLAINTIFF'S COMPLAINT**

Come the Plaintiffs, Amanda Michel, as parent and natural guardian of D.M., a minor, and Amanda Michel, individually, with the consent of the Defendants, Union County Board of Education, James E. Carter, Larry Kerr, Derek Marlow, and Shane Brown, and moves for an Extension of Time for Plaintiffs to file their Response to Defendants Union County Board of Education, James E. Carter, Larry Kerr, Derek Marlow, and Shane Brown's Motion to Dismiss Plaintiff's Complaint which was filed on August 10, 2020.

Plaintiff's Complaint was filed on June 5, 2020, asserting claims against Defendants pursuant to 42 U.S.C. § 1983 and pendant state law negligence claims. [Doc. 1]. The parties filed a Stipulation for Extension of Time for Defendants to File Responsive Pleadings to Complaint on July 2, 2020, [Doc. 19], which was granted by Order entered July 6, 2020, therein extending the time until July 27, 2020. The parties stipulated on July 23, 2020, to the voluntary dismissal without prejudice of Defendants Union County Public Schools and Union County, Tennessee. [Doc. 21]. The parties then filed a Joint Motion for Extension of Time for Defendants to File Responsive Pleadings to Complaint on July 23, 2020, [Doc. 22], which was granted by Order entered July 24, 2020, therein extending the time until August 10, 2020.

Defendants Union County Board of Education, James E. Carter, Larry Kerr, Derek Marlow, and Shane Brown filed a Motion to Dismiss Plaintiff's Complaint on August 10, 2020; thus Plaintiffs' responsive pleadings were due on or before August 31, 2020. The parties are in agreement that Plaintiffs have an additional 21 days or such other time as the Court may deem proper in which Plaintiffs shall file responsive pleadings.

WHEREFORE, the parties jointly move that Plaintiffs have an additional 21 days or until September 21, 2020 in which Plaintiffs shall file responsive pleadings to Defendants Motion to Dismiss.

Respectfully submitted this 3<sup>rd</sup> day of September, 2020.

s/Timothy L Baldridge

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Board of Education, James E. Carter, Larry  
Kerr, Derek Marlow, and Shane Brown

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Joint Motion For Extension of Time for Plaintiffs to File Responsive Pleadings to Defendants Union County Board of Education, James E. Carter, Larry Kerr, Derek Marlow, and Shane Brown's Motion to Dismiss Plaintiff's Complaint was filed with the Court using the CM/ECF system this 3<sup>rd</sup> day of September, 2020, which will provide copies to all parties of record.

/s/ Timothy L. Baldrige

Timothy L. Baldrige